

Greg L. Lippetz (State Bar No. 154228)
glippetz@jonesday.com
Jacqueline K. S. Lee (State Bar No. 247705)
jkslee@jonesday.com
JONES DAY
1755 Embarcadero Road
Palo Alto, CA 94303
Telephone: 650-739-3939
Facsimile: 650-739-3900

Attorneys for Plaintiff and
Counterclaim Defendant
FREESCALE SEMICONDUCTOR, INC.

RONALD S. LEMIEUX (SB# 120822)
ronlemieux@paulhastings.com
VIDYA R. BHAKAR (SB# 220210)
vbhakar@cooley.com
SHANEE Y.W. NELSON (SB# 221310)
shaneenelson@paulhastings.com
COOLEY LLP
3000 El Camino Real
Five Palo Alto Square
Palo Alto, CA 94306-2155
Telephone: (650) 843-5000
Facsimile: (650) 849-7400

Attorneys for Defendant and
Counterclaim-Plaintiff
CHIPMOS TECHNOLOGIES, INC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

Freescall Semiconductor, Inc.,

Plaintiff,

v.

ChipMOS Technologies, Inc.,

Defendant.

Case No. C-09-03689-JF-RS

**STIPULATED REQUEST AND
~~[PROPOSED]~~ ORDER TO EXTEND
TIME FOR EXPERT DISCOVERY**

Date: N/A
Time: N/A
Courtroom: 3, 5th Floor
Judge: Hon. Jeremy Fogel

Pursuant to Local Rule 6-2, Plaintiff Freescall Semiconductor, Inc. ("Freescall") and Defendant ChipMOS Technologies, Inc. ("ChipMOS," and together with Freescall, the "Parties") jointly submit this stipulated request to extend time for expert discovery.

The April 1, 2011 Joint Scheduling Order set an expert discovery cut-off date of June 17, 2011. *See* ECF No. 72. Freescall's expert Dr. Robert G. Harris will be out of the country and thus unavailable for deposition through June 19, 2011. Accordingly, the parties have agreed to schedule Dr. Harris's deposition for June 29, 2011. The Parties jointly request that the date for the close of expert discovery be extended to June 29, 2011, for the limited purpose of allowing Dr. Harris's deposition to be taken.

This request for an extension is supported by the Declaration of Greg L. Lippetz, filed

1 concurrently herewith.

2 **IT IS SO STIPULATED.**

3 Dated: June 7, 2011

JONES DAY

4
5 By: /s/ Greg L. Lippetz
6 Greg L. Lippetz

7 Counsel for Plaintiff
FREESCALE SEMICONDUCTOR, INC.

8 In accordance with General Order No. 45, Section X(B), the above signatory attests that
9 Concurrence in the filing of this document has been obtained from the signatory below.

10 Dated: June 7, 2011

COOLEY LLP

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12 By: /s/ Ronald S. Lemieux
13 Ronald S. Lemieux

14 Counsel for Defendant
CHIPMOS TECHNOLOGIES, INC.

15 **IT IS SO ORDERED.**

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20 DATED: 6/8/11

21 By: 
22 Hon. Jeremy Fogel